

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

Case No. 20-10322(CLB)

The Roman Catholic Diocese of
Buffalo, New York
Debtor.

Chapter 11

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE, that on March 19th 2025, AB 527 Doe and AB 529 Doe, by and through its undersigned counsel, filed with the United States Bankruptcy Court for the Western District of New York (the “Court”) the Motion for Entry of an Order made on behalf of AB 527 Doe and AB 529 Doe modifying the automatic stay pursuant to 11 U.S.C. § 362(d)(1), Federal Rule of Bankruptcy Procedure 4001, and Local Rule 4001-1. The Motion here requests permission to allow AB 527 Doe and AB 529 Doe to conduct brief and limited discovery against the Diocese of Buffalo, St. Ambrose School and/or its successor custodian of records, and St. Thomas Aquinas School and/or its custodian of records relative to the employment history of Robert Weber (“Weber”), during his time while employed by the foregoing schools. Neither AB 527 Doe nor AB 529 Doe have direct or indirect claims against the Diocese, St. Ambrose School, or St. Thomas Aquinas School.

PLEASE TAKE FURTHER NOTICE, that AB 527 Doe and AB 529 Doe, by and through its counsel, filed their First Motion for Relief from the Automatic Stay (Dkt. 3732) and Declaration of Robert E. Gallagher, Jr., in Support of the Motion for Stay Relief (Dkt. 3734) in connection with this Motion.

PLEASE TAKE FURTHER NOTICE, that AB 527 Doe and AB 529 Doe, by and through its counsel, will move before the Honorable Carl L. Bucki, Chief United States Bankruptcy Judge for the Western District of New York on the 7th day of April, 2025 at 11:30 a.m., or as soon thereafter as counsel may be heard, for an Order: allow AB 527 Doe and AB 529 Doe to conduct brief and limited discovery against the Diocese of Buffalo, St. Ambrose School and/or its successor custodian of records, and St. Thomas Aquinas School and/or its custodian of records relative to the employment history of Robert Weber (“Weber”), during his time while employed by the foregoing schools.

PLEASE TAKE FURTHER NOTICE that those wishing to appear telephonically may do so through the Court’s Telephone Conference System, by dialing 571-353-2301. When prompted for the ‘Number you wish to Dial’ enter: 483077448#. When prompted for the ‘Security Pin’ enter: 9999#.

PLEASE TAKE FURTHER NOTICE, that all affidavits and memoranda in opposition to the relief requested to the Motion herein shall be served upon (i) counsel to AB 527 Doe and AB 529 Doe, Steve Boyd, P.C.; 2969 Main Street, Suite 100; Buffalo, New York 14214; Attn: Robert E. Gallagher, Jr.; (ii) the Office of the United States Trustee for the Western District of New York, 300 Pearl Street, Suite 401, Buffalo, New York 14202, Attn: Joseph W. Allen, (iii) counsel to the Official Committee of Unsecured Creditors, Pachulski, Stang, Ziehl & Jones, LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, California, 90067-4003, Attn: James I. Stang, and 780 Third Avenue, 34th Floor, New York, New York, 10017-2024, Attn: Ilan Scharf, and (iv) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

/s/Robert E. Gallagher, Jr.

Robert E. Gallagher, Jr., Esq.

Steve Boyd, P.C.

Attorneys for AB 527 Doe and AB 529 Doe

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